

ROCKY FLATS SITE REGULATORY CONTACT RECORD

Purpose: Excavation by Xcel Energy for Valve Replacement on 12-inch Golden Pipeline

Contact Record Approval Date: June 29, 2009

Site Contact(s) / Affiliation(s): Scott Surovchak, DOE; John Boylan, S.M. Stoller; Linda Kaiser, S.M. Stoller; Jeremiah McLaughlin, S.M. Stoller; Rick DiSalvo, S.M. Stoller

Regulatory Contact(s) / Affiliation(s): Carl Spreng, CDPHE

Discussion: Xcel Energy operates a natural gas line located within a utility easement in the Central Operable Unit (COU). Most of this natural gas line is beneath the ground surface. A valve station is located near the eastern boundary of the COU. The valve equipment will be replaced by Xcel Energy and/or its subcontractors (collectively called “Xcel”). The project description included in Attachment 1 to this contact record was provided by Xcel’s consultant. Xcel will perform the work, and DOE will provide access to the work area in accordance with the utility easement. Rocky Flats personnel will not be involved directly with the work but will remain cognizant of the work and coordinate with Xcel to resolve any issues that arise while it is being performed.

CDPHE and site personnel informally consulted regarding this work on May 14, 2009.

The excavation involves actions prohibited by the institutional controls (ICs) incorporated in the Rocky Flats Legacy Management Agreement (RFLMA). The excavation work is a soil disturbance, and it will exceed the 3-foot depth limit set by ICs (RFLMA, Attachment 2, Table 4, Control 2) and thus requires pre-approved procedures.

The objective of IC 2, regarding excavations with a depth that exceeds 3 feet, is to maintain the current depth to subsurface contamination or contaminated structures. This IC also results in achieving compliance with the CDPHE risk management policy of ensuring that residual risks to the site user are at or below 1×10^{-6} . As discussed below, the proposed work achieves the risk management policy goal.

The excavated area will be backfilled with the excavated materials, and the elevations will approximate the preconstruction elevations. We do not anticipate that any excess excavated soils will remain after completion of the work. However, any excess soils may be used for minor fill or revegetation use at other appropriate locations on site.

Xcel has agreed to implement the best management practices in the *Erosion Control Plan for Rocky Flats Property Central Operable Unit, DOE-LM/1497-2007* (ECP) to provide erosion controls for the excavated materials so that run-on and runoff will be minimized. In addition, the disturbed area will be reseeded, and final erosion controls (e.g., erosion matting) will be installed and maintained until ECP revegetation success criteria are met.

CDPHE has requested that the following information be included in contact records for soil excavation:

1 - Provide information about any remaining subsurface structures in the vicinity so that the minimum cover assumption won't be violated (or state that there are none if that is the case)-

There are no remaining subsurface structures in the work area, other than the aforementioned natural gas line.

2 - Provide information about any former IHSSs/PACs or other known soil or groundwater contamination in the vicinity (or state that there is no known contamination)-

The excavation area is not in any former IHSSs/PACs. This excavation area is within the Windblown Area Exposure Unit (WBEU), which was evaluated in the *RCRA Facility Investigation-Remedial Investigation/Corrective Measures Study-Feasibility Study Report for the Rocky Flats Environmental Technology Site*, Appendix A, Comprehensive Risk Assessment, Volume 9 (CRA). Arsenic and plutonium-239/240 were identified as residual surface soil contaminants of concern for the WBEU. The East Trenches Plume exists in groundwater in this vicinity, but excavation will not extend to a depth that would intercept groundwater. The exposure scenarios evaluated in the CRA included excavation for maintenance purposes and incidental contact with groundwater, and based on the CRA, there would be no significant risk from excavation in this area.

3 - Resurvey any new surface established in subsurface soil, unless sufficient existing data is available to characterize the surface (or state that the excavated soil will be replaced and the original contours restored)-

All excavated soils are expected to be returned to the excavation as previously discussed, and original contours will be restored.

Closeout of Contact Record: This contact record will be closed when the excavations are backfilled and when seeding for revegetation and revegetation erosion controls, as needed, are completed.

Resolution: Carl Spreng, CDPHE, approved the excavation work as described in this contact record.

Contact Record Prepared by: Rick DiSalvo

Distribution:

Carl Spreng, CDPHE

Scott Surovchak, DOE

Linda Kaiser, S.M. Stoller

Rocky Flats Contact Record File